



November 5, 2008

VIA FEDERAL EXPRESS

Thomas C. Nash, Esquire
Associate Regional Counsel
U. S. Environmental Protection Agency
Region 5, C-14J
77 West Jackson Boulevard
Chicago IL 60604-3590

**Re: Chemical Recovery Systems Site
Elyria, Ohio**

Dear Tom:

Based upon our recent conversation, I am resubmitting copies of the following documents and requesting that you remove Elyria Foundry Company from the potentially responsible parties list in this matter:

1. Articles of Incorporation of Ethan Foundries Company, and Certificate of Ohio Secretary of State, dated July 26, 1983;
2. Certificate of Ohio Secretary of State dated December 8, 1988, regarding change of corporate name of Ethan Foundries Company to Elyria Foundry Company;
3. Agreement Between Ethan Foundries Company, as Buyer, and Chromalloy American Corporation and Elyria Foundry Company, dated August 1, 1983 regarding purchase of certain assets (please note exclusionary language as to liabilities or obligations of Chromalloy on page 7, and obligation of Chromalloy to indemnify Buyer for environmental matters on page 26);
4. Letter dated March 12, 2001 from Elyria Foundry Company to U.S. Environmental Protection Agency responding to your 104 (e) request of March 2, 2001;
5. My handwritten notes from a conversation with you on June 15, 2001;
6. My follow-up email to you dated June 15, 2001;
7. Various emails from December, 2001; and
8. Correspondence to you transmitting the above documents, undated, but sent in late December, 2001.

Thomas C. Nash, Esquire
Page 2

November 5, 2008

As I have previously stated, our company, Elyria Foundry Company, was originally incorporated in Ohio in 1983 under the name Ethan Foundries Company. The corporation's name was changed later in 1988 to Elyria Foundry Company.

On August 1, 1983, Ethan Foundries Company entered into the enclosed Agreement with Chromalloy American Corporation and its subsidiary, Elyria Foundry Company, for the purchase of certain assets. The "Elyria Foundry Company" mentioned in the Agreement was a wholly owned subsidiary of Chromalloy American Corporation which was later dissolved, and is not related to our current company.

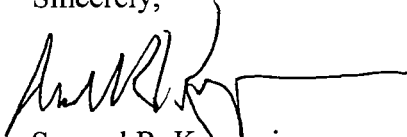
Prior to 1983, Ethan Foundries Company did not exist and thus never operated any business from the Chromalloy location and never did any business with Chemical Recovery Systems.

Based upon all of the foregoing, it is clear that Ethan Foundries Company, now known as Elyria Foundry Company, has no liability with respect to the Chemical Recovery Systems site, and should not be considered a potentially responsible party.

If you require any additional information or have any questions, please give me a call. I would appreciate your providing confirmation that U.S. Environmental Protection Agency will remove Elyria Foundry Company from the list of potentially responsible parties with respect to the Chemical Recovery Systems site.

I appreciate your assistance in this matter.

Sincerely,



Samuel R. Knezevic
Chief Operating Officer and General Counsel

cm

✓ cc: Mary Tierney, Remedial Project Manager, U.S. EPA

Encl.